

**REMARKS**

In the Final Office Action mailed October 14, 2008, the Examiner rejected claims 1 and 19 under 35 U.S.C. §112, first paragraph for failing to comply with the enablement requirement and the written description requirement; rejected claims 1 and 19 under 35 U.S.C. §112, second paragraph; and rejected claims 1-2, 5-8, 10-11, 18-20, 23-26, 28, and 29 under 35 U.S.C. §103 as unpatentable over U.S. Patent No. 6,460,043 to Tabbara et al. (Tabbara) in view of U.S. Patent Publication No. US2004/0260749 to Trossen et al. (Trossen).

By this amendment, Applicants amend claims 1 and 19 in response to the rejections under section 112 and to more clearly recite the features of those claims.

Claims 1, 2, 5-7, 19, 20, and 23-25 are currently pending.

Regarding the rejections under 35 U.S.C. §112, first paragraph, Applicants have amended claims 1 and 19 to essentially mirror features recited in paragraph 045 and FIG. 3. Applicants submit that the specification clearly supports the following features of claims 1 and 19: "the semantic object provider comprising a semantic object class defining an application programming interface to create an object, a semantic object implementation class to provide persistency to information related to a class, and an object registry to interact with a class implemented by a repository." Because the specification clearly supports the above-noted features of claims 1 and 19, the rejections of claims 1 and 19 under 35 U.S.C. §112, first paragraph, for enablement and written description, should be withdrawn.

For at least the reasons given above with respect to the rejection under 35 U.S.C. §112, first paragraph, the rejection under 35 U.S.C. §112, second paragraph, should be withdrawn, too.

On page 7 of the Final Office Action, the Examiner states that "Applicant's argument regarding rejection of claims 1 and 19 under 35 U.S.C. 103 stated as "Tabbara suggests or discloses the semantic object provider." To make the instant record clear, Applicants did not

state that "Tabbara suggests or discloses the semantic object provider," but instead Applicants argued that Tabbara failed to (i.e., did not) disclose or suggest the "semantic object provider."

The Examiner rejected claims 1, 2, 5-7, 19, 20, and 23-25 under 35 U.S.C. §103 as unpatentable over Tabbara in view of Trossen. Applicants respectfully traverse this rejection.

Claim 1, as amended, recites a combination of features including, among other things, "converting, at a semantic object provider, the received semantic request to a generic request having corresponding request parameters, the semantic object provider comprising a semantic object class defining an application programming interface to create an object, a semantic object implementation class to provide persistency to information related to a class, and an object registry to interact with a class implemented by a repository."

Applicants respectfully point out that the Examiner appears to be ignoring the express language of claim 1. Specifically, the Examiner appears to have ignored the following recitation of claim 1: "the semantic object provider comprising a semantic object class defining an application programming interface to create an object, a semantic object implementation class to provide persistency to information related to a class, and an object registry to interact with a class implemented by a repository." Applicants respectfully remind the Examiner that M.P.E.P. 2131 states "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)." For at least this reason, the finality of the instant Office Action should be withdrawn. Moreover, Applicants submit that Tabbara and Trossen are completely silent with respect to this feature of claim 1 for at least the reasons given below.

At page 8 of the Final Office Action, the Examiner alleges that Tabbara at col. 10, lines 55-56 discloses or suggests the "semantic object provider" and alleges that a predicate provides the semantic context for objects and consists of one or more roles that objects play. Applicants disagree and submit that a closer scrutiny of Tabbara at col. 10, lines 55-56 reveals

that it fails to teach any form of a “semantic object provider,” much less “the semantic object provider comprising a semantic object class defining an application programming interface to create an object, a semantic object implementation class to provide persistency to information related to a class, and an object registry to interact with a class implemented by a repository,” as recited in claim 1.

Instead, Tabbara at col. 10, lines 55-56 merely discloses “Predicates,” not the claimed features noted above. Specifically, Tabbara states:

Predicates: A Predicate provides the semantic context for Objects and consists of one or more Roles that Objects' play. The Predicate determines the nature of the Role an Object plays. Any Role can be attributive (that is, can define a Value of an Object type), as in “Business 100 has Name Café Lago”. Or, a Predicate can define relationship between one Object and another, as in “Business 100 sells Product 200”. FIG. 8A illustrates the information (SConceptualPredicate) kept for each Predicate. The DDF includes a unique ID for the Predicate, the canonical Predicate name, a count of Roles in the Predicate, an array of Role structures for each Role, and the stand-alone physical mapping information for the Predicate.

Tabbara, col. 10, lines 55-67. Indeed, Tabbara's “Predicate” relates to “determin[ing] the nature of the Role an Object plays” and lacks any of the claimed structural features of a semantic object provider, such as “a semantic object class defining an application programming interface to create an object,” “a semantic object implementation class to provide persistency to information related to a class,” and “an object registry to interact with a class implemented by a repository.” As a consequence, Tabbara fails to disclose or suggest at least the following feature of claim 1: “converting, at a semantic object provider, the received semantic request to a generic request having corresponding request parameters, the semantic object provider comprising a semantic object class defining an application programming interface to create an object, a semantic object implementation class to provide persistency to information related to a class, and an object registry to interact with a class implemented by a repository.” Moreover,

although Trossen discloses semantic binding in networks, it fails to cure the above-noted deficiencies of Tabbara. Because neither Tabbara nor Trossen discloses or suggests the above-noted features of claim 1, claim 1 is allowable over Tabbara and Trossen, whether taken alone or in combination. Therefore, the rejection of claim 1 and claims 2 and 5-7, at least by reason of their dependency from independent claim 1, should be withdrawn.

Since neither Tabbara nor Trossen teaches a "semantic object provider," neither reference suggests or discloses the "initiating, by the semantic object provider, a creation of the object for receiving and converting the semantic request" feature of claim 1. Because neither Tabbara nor Trossen discloses or suggests the noted features of claim 1, claim 1 is allowable over Tabbara and Trossen, whether taken alone or in combination. Therefore, the rejection of claim 1 and claims 2 and 5-7, at least by reason of their dependency from independent claim 1, should be withdrawn for this additional reason.

Independent claim 19, although of different scope, includes features similar to those noted above for claim 1. For at least the reasons given above with respect to claim 1, claim 19 as well as claims 20 and 23-25, at least by reason of their dependency from corresponding independent claim 19, are allowable over Tabbara and Trossen, whether taken alone or in combination, and the rejection of those claims under 35 USC § 103(a) should be withdrawn.

**CONCLUSION**

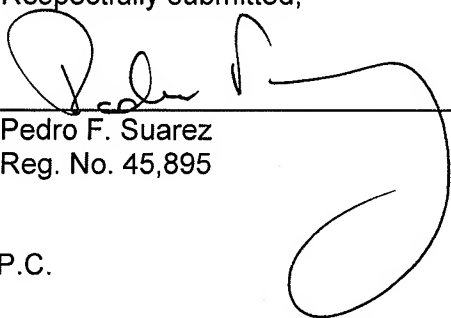
Applicants respectfully request that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner. Applicants submit that the proposed amendments do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner. Therefore, this Amendment should allow for immediate action by the Examiner. Finally, Applicants submit that the entry of the amendment would place the application in better form for appeal, should the Examiner continue to dispute the patentability of the pending claims.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

On the basis of the foregoing amendments, Applicants respectfully submit that the pending claims are in condition for allowance. No fees are believed to be due, however, the Commissioner is hereby authorized to charge any fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-081/2002P10157US. If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

Respectfully submitted,

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